

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,
a foreign corporation,

Plaintiff,

Case No. 2:11-cv-12422-AC-MKM

v.

Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,
MONICA LYNN LUPILOFF, NICOLE RENEE
LUPILOFF and NICOLE RENEE LUPILOFF,
PERSONAL REPRESENTATIVE OF THE
ESTATE OF GARY LUPILOFF, DECEASED,

Defendants.

Michael F. Schmidt (P25213)
Harvey Kruse, P.C.
Attorney for Plaintiff
1050 Wilshire Drive, Suite 320
Troy, MI 48084
248-649-7800

Albert L. Holtz (P15088)
ALBERT L. HOLTZ, P.C.
Attorney for Monica Lupiloff, Nicole Lupiloff
and Nicole Lupiloff Personal Representative
of the Estate of Gary Lupiloff, deceased
3910 Telegraph Road, Suite 200
Bloomfield Hills, MI 48146
248-593-5000

John H. Bredell (P36577)
Bredell & Bredell
Attorney for Defendants, William
& Jennifer Keene
119 N. Huron Street
Ypsilanti, MI 48197
734-482-5000

Geoffrey N. Fieger (P30441)
Jeffrey A. Danzig (P36571)
Attorney for Monica Lupiloff,
Nicole Lupiloff and Nicole
Lupiloff, Personal Representative
of the Estate of Gary Lupiloff,
deceased
19390 West Ten Mile road
Southfield, MI 48075
248-355-5555

DEFENDANT, WILLIAM KEENE'S,
SUPPLEMENTAL RESPONSE TO INTERROGATORY 17(f)
TO PLAINTIFF'S MOTION TO COMPEL
(May 14, 2013)

DEFENDANT, WILLIAM KEENE'S,
SUPPLEMENTAL RESPONSE TO INTERROGATORY 17(F)
TO PLAINTIFF'S MOTION TO COMPEL
(May 14, 2013)

- 1) See attached documents regarding National City Home equity line of credit account ending #7813:
 - a. the 2/13/13 PNC Bank Letter (unredacted and complete copy)

AND

 - b. An executed RDS authorization for the release of all PNC statements, so that Plaintiff can obtain statements from 1998 to 2010.

- Defendant Keene has already supplied Plaintiff with an executed authorization to obtain this documentation. The cost of these documents is \$230.00 (see attached email from Nicole Kolka, Jackson/Zeeb Office, PNC Branch Manager). Plaintiff may pay for and obtain these records at their own discretion.
- 2) See attached documents regarding Washington Mutual Account ending #1514:
 - a. Statements for all months from 1/8/2005 - 2/16/2011

AND

 - b. A letter from Chase indicating that this financial information was requested and all available information has been produced.
- 3) See attached documents regarding Chase MasterCard account ending #0389:
 - a. Statements from 12/11/06 to 4/10/08 and 8/11/08 to 12/10/08, including pages two (2) through the end.

AND

 - b. A letter from Chase stating that statements for activity between 4/11/08 to 8/10/08 were requested but are not available due to no activity.
- 4) Documents regarding National City Card account ending #9960:
 - a. All statements for this account from 2007 to 2010.

AND

 - b. Affidavit of Bill Keene stating that this line of credit was opened January 2007.

WHEREFORE, Plaintiff's Motion to Compel should be denied.

Respectfully Submitted:

Dated: May 14, 2013

/s/John H. Bredell
119 N. Huron Street
Ypsilanti, Michigan 48197
Phone: (734) 482-5000
E-mail: jbredell@bredell.com
P36577

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: Michael F. Schmidt, Albert L. Holtz, and Geoffrey N. Fieger/Jeffrey A. Danzig. I further certify that on May 14, 2013, a copy of the foregoing along with the exhibits was mailed to: Michael F. Schmidt, Albert L. Holtz, and Geoffrey N. Fieger/Jeffrey A. Danzig.

s/John H. Bredell
119 N. Huron Street
Ypsilanti, Michigan 48197
Phone: (734) 482-5000
E-mail: jbredell@bredell.com
P36577